

[Submitting Counsel on Signature Page]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

**IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION**

**THIS DOCUMENT RELATES TO:**

ALL CASES

MDL No. 3047

Case No. 4:22-md-03047-YGR

**DECLARATION OF MATTHEW  
COCANOUGH IN SUPPORT OF  
KENTUCKY ATTORNEY GENERAL'S  
MOTION TO ENLARGE TIME FOR  
STATE AGENCY SUBSTANTIAL  
COMPLETION**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

I, MATTHEW COCANOUGHER, hereby declare and state as follows:

1. I am an Assistant Attorney General in the Office of Consumer Protection of the Kentucky Office of the Attorney General. I am a member in good standing in the Kentucky Bar Association. I am one of the attorneys representing Kentucky in this law enforcement action. The following facts are within my personal knowledge, except for those stated on information and belief, and, if called upon to testify, I could and would testify completely to the truth of the matters stated herein.
2. I have been one of the attorneys for the Kentucky Office of the Attorney General helping to coordinate state agency document productions.
3. On December 20, 2024, the Kentucky Governor's Office, Office of the State Declaration of Matthew Cocanougher in Support of Kentucky Attorney General's Motion to Enlarge Time for State Agency Substantial Completion

1 Budget Director, Cabinet for Health and Family Services, Department for Public  
2 Health and Department for Behavioral Health, Developmental and Intellectual  
3 Disabilities (collectively, “Kentucky State Agencies”) agreed to search terms and  
4 custodians with Meta.

- 5
- 6 4. The Kentucky Commonwealth Office of Technology (“COT”) had a small team of  
7 two working on running the search terms for the proper custodians. These two  
8 team members worked diligently to pull the large amount of data from the search  
9 terms.
- 10 5. On January 22, 2025, COT was able to provide the above Kentucky State  
11 Agencies with the data to review.
- 12 6. The Kentucky Governor’s Office and Office of State Budget Director has a small  
13 team of two reviewers. The Cabinet for Health and Family Services, Department  
14 for Public Health and Department for Behavioral Health, Developmental and  
15 Intellectual Disabilities also have a small team of three reviewers.
- 16 7. While COT and the Kentucky State Agencies at issue have all worked toward  
17 meeting today’s substantial completion date, the Kentucky State Agencies are not  
18 going to be able to meet substantial completion by January 31, 2025.
- 19 8. As such, despite the work that has gone into attempting to meet today’s deadline,  
20 the Kentucky Attorney General respectfully requests an enlargement of time to  
21 February 28, 2025 for substantial completion.
- 22 9. After discussions with the Kentucky State Agencies about the progress of their  
23 production, the Kentucky Attorney General contacted Meta’s counsel today  
24 (January 31, 2025) to request an extension.
- 25 10. Meta’s counsel responded noting that they could not agree to the extension absent  
26 a broader agreement regarding discovery deadlines. They cited substantial  
27 prejudice if this extension was granted because it would be too close to the date  
28 ranges for the 30(b)(6) deposition of Kentucky.

1 11. Kentucky will be prejudiced absent an enlargement of time as it will be unable to  
2 meet today's substantial completion deadline despite all the work from COT and  
3 the Kentucky State Agencies.

4 12. On December 31, 2024, the Court set the substantial completion deadline for  
5 Kentucky of January 31, 2025 (Document 1495-1, Page 11 of 26). To my  
6 knowledge, this date has not been modified after the Court's Order.

7 13. It is anticipated that the requested time modification may require an accompanying  
8 enlargement of time (from the current deadline of 3/7/25 to 4/4/25) for Meta to  
9 take a 30(b)(6) deposition for Kentucky.

10  
11 I declare under penalty of perjury under the laws of the United States of America that  
12 the foregoing is true and correct.

13 Executed on January 31, 2025 in Danville, Kentucky.

14 /s/ Matthew Cocanougher  
15 Matthew Cocanougher  
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